

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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WILLIAM J. WAGNER,

Plaintiffs,

v.

Civil Action No.1:15-cv-633-FPG

CHIARI & ILECKI, LLP,

Defendant.

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**MOTION FOR PARTIAL SUMMARY JUDGMENT**

PLEASE TAKE NOTICE that on the documents annexed in Plaintiff's Appendix annexed to this motion, Plaintiff William J. Wagner will move this Court at a date and time to be set by the court, for an order pursuant to Rule 56 of the Federal Rules of Civil Procedure granting to the Plaintiff partial summary judgment in his favor adjudicating Defendant's liability for its violations of the Fair Debt Collection Practices Act (15 U.S.C. §§1692e, 1692e(2)(A), 1692e(10), and 1692f), together with such other and further relief that this Court deems just and equitable.

Dated: January 24, 2017

/s/Kenneth R. Hiller  
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